

Brazos WiFi

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Marlene H. Dortch, Secretary

Federal Communications Commission

RE: GN Docket No. 12-354, RM-11778 and RM-11789

Our company, Brazos WiFi, grew from the need for fast and reliable internet in the rural areas of Brazos County, Texas. Just over 5 years ago, I saw the need to deliver bandwidth outside the areas that the traditional telcos and cables companies have ignored. We began with unlicensed wireless gear in the 900Mhz, 2.4Ghz, and 5Ghz bands. We began using 3.65Ghz equipment to help with foliage penetration. In our areas, trees are a significant problem for rural wireless delivery. With the advances in low-cost LTE systems such as Baicells, Telrad, and others, we can now reach those who were previously unserviceable.

We have just over 1000 customers and are adding about 50 a month now. We currently sell (and actually deliver) plans up to 30Mbps download and 10Mbps upload. These packages enable home businesses to flourish in today's information age. Our infrastructure is built to deliver more but LOS issues contribute to the high number of folks that we cannot service.

Many of our future customers have LOS issues to the towers. LTE systems using 3.65 and the new CBRS band will allow for much greater delivery options for those folks who have the fewest alternatives. All of our new tower sites are being outfitted with LTE systems with the expectation that the CBRS band will allow us to better service those folks which are hard to reach.

We plan to secure CBRS spectrum in our areas to better deliver internet to future customers. An additional block of mid-band spectrum with limited interference will be a fantastic opportunity to better service the rural areas which are neglected by the large players. Additional spectrum is nearly impossible to secure without very deep pockets. Wireless ISP's such as ourselves work very hard with thin margins to deliver internet to our neighbors, communes, towns, and cities in our areas. This spectrum is very important to future delivery options for WISPs such as Brazos WiFi and others.

We oppose the CTIA and T-Mobile petitions which have swooped in at the 11th hour trying to change the rules which manufacturers, industry, and engineers have worked so hard to hammer out.

Thank You,

James Bouse
Owner, Brazos WiFi